



City of Thornton
DRAFT 2021 Annual Action Plan
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Parks, Recreation & Community Programs
Department

Contents

Executive Summary.....	3
AP-05 Executive Summary - 91.200(c), 91.220(b)	3
PR-05 Lead & Responsible Agencies - 91.200(b)	7
AP-10 Consultation - 91.100, 91.200(b), 91.215(l)	9
AP-12 Participation - 91.401, 91.105, 91.200(c)	18
Expected Resources	22
AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)	22
Annual Goals and Objectives	24
AP-35 Projects - 91.420, 91.220(d)	26
AP-38 Project Summary	28
AP-50 Geographic Distribution - 91.420, 91.220(f)	32
AP-75 Barriers to affordable housing -91.420, 91.220(j)	34
AP-85 Other Actions - 91.420, 91.220(k)	36
Program Specific Requirements.....	40

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

An Annual Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) from all jurisdictions receiving Community Development Block Grant (CDBG) funds. The City of Thornton (City or Thornton) is submitting its second program year Action Plan for the 2020-2024 Consolidated Plan.

The 2021 Annual Action Plan (AAP) was developed in accordance with HUD guidelines 24 Code of Federal Regulations (CFR) Part 91.220. This document represents a cooperative effort between the City of Thornton, Adams County, the public, and housing and service providers. It outlines the City's needs, goals, and strategies for the 2021 program year and addresses citizen involvement, including information on available and potential resources. The priorities developed in this plan target a wide range of issues from basic needs, such as the availability of affordable housing for families and individuals, to overall community quality of life issues, such as improving facilities that provide services to low- and moderate- income (LMI) residents.

Thornton's program year runs from October 1, 2021 through September 30, 2022. Thornton's Parks, Recreations, and Community Programs Department is responsible for administration of the CDBG program and works with other City staff to accomplish the goals in the Consolidated Plan. CDBG activities, which are outlined in this plan, adhere to the three national objectives established by HUD:

- 1) Activities principally benefiting low- and moderate-income residents;
- 2) Aid in the prevention or elimination of slums or blight; and
- 3) Meeting an urgent community need.

In 2021, Thornton will continue to participate in the Adams County Urban Consortium and will receive a proportionate share of HOME Investment Partnerships Program (HOME) funds to assign to a future housing project. The County is the lead jurisdiction and is responsible for administration of the HOME funds, including the public comment period.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

In 2021, Thornton will undertake new initiatives and complete activities that are currently underway through previous CDBG allocations. This year's CDBG allocation will be used to meet the needs of LMI individuals in three areas and address three priority needs from the Consolidated Plan:

- Affordable Housing – This project serve low- to moderate-income (LMI) homeowners through the Help for Homes program that provides grants for home repairs which address health, safety, accessibility, and energy-efficiency needs.
- Public Facilities – The City plans to improve park and recreation opportunities, street improvements, add public works of art in LMI neighborhoods. The City also plans to complete the installation of a sidewalk in a LMI neighborhood.
- Public Service – Thornton will expand access to public services to people experiencing homelessness.

The three priority needs these activities will address are:

- Affordable Housing
- Non-Housing Community Development
- Homelessness Services

The City will also continue to expand upon successful activities initiated in the past to meet ongoing goals, such as:

- Working to increase the amount of affordable and accessible housing in the community.
- Hosting first-time homebuyer education workshops to explain the mortgage process and credit requirements.
- Partnering with HUD-certified housing counseling agencies to promote information from a reliable source.
- Offering short-term assistance on water bills to low-income residents.
- Taking actions to affirmatively further fair housing (non-discrimination).

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Each year staff evaluates the previously funded CDBG activities to ensure the community is receiving the greatest benefit possible. First, staff review the priority needs listed in the Consolidated Plan to identify if there are priorities that have not been addressed. Second, staff identifies unmet and growing needs within the community through public input on various City plans, at community meetings and from conversations with residents. Staff discusses resident needs with local service providers and other City

departments to figure out if CDBG funds can be used to fund solutions for these needs. The City works to use CDBG in the most impactful way and to leverage CDBG with other resources..

Over the last year, Thornton has focused CDBG towards responding to the COVID-19 pandemic by increasing the amount of affordable housing, keeping people in their homes, and supporting a wide-range of public services targeted to Thornton's vulnerable populations. . Examples of housing activities undertaken include funding the storm water fee for a new 64-unit affordable apartment building, emergency rent/mortgage assistance for domestic violence survivors and LMI residents, reducing energy costs for LMI homeowners through solar panel installation, and addressing safety and accessibility through home repair programs for LMI homeowners. Examples of public infrastructure projects include improving storm water drainage in a neighborhood that flooded after every rainstorm or spring snow melt and installing an emergency outlet for a detention basin that can overflow into homes in a LMI neighborhood after heavy storms..

Staff updates projects in HUD's online reporting system, the Integrated Disbursement and Information System (IDIS), on a regular basis to ensure that demographic data and expenditures are reported accurately and within a reasonable timeframe. City staff have submitted all mandatory documents and reports within the HUD deadlines. To date, IDIS reports that 100% of the funds expended by the City have benefitted LMI individuals or areas.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Staff makes a concerted effort to identify and meet the needs in the community when developing the Annual Action Plan. CDBG staff routinely meet and collaborate with public and assisted housing providers, public service agencies, and key internal City departments throughout the year about the needs that are not being adequately addressed of the low and moderate-income residents. Further, staff discussed ways in which CDBG can be utilized to address these needs.

Staff notified the public about the Annual Action Plan and projects eligible for CDBG funding in order to engage residents in the process and obtain their perspective on whether these projects would help address the needs in the community:

Public Notification. Staff published a legal notice in the local paper to announce the public comment period and the public hearing date as well as posted notices about the public hearing at the City Hall, Active Adult Center, and the Margaret W. Carpenter Recreation Center. The notices informed residents about the public hearing to discuss the proposed 2021 Annual Action Plan and included a 12-day public comment period that was in compliance with the City's Citizen Participation Plan, taking into account the waiver for the 2021 waiver. The notice provided information on ADA accessibility and who to contact if a person needed special assistance or language translation.

Public Hearing. The City held a public hearing on July 27, 2021. The public was invited to provide comments on the Action Plan and proposed activities. Due to the on-going COVID-19 public health emergency, the public hearing was held virtually and Spanish translation was available.

City Website. The City's CDBG webpage summarized the eligible activities for 2021 CDBG funding and requested feedback on the Annual Action Plan. The webpage contained a downloadable version of the plan, notice about the public hearing and contact information for staff. The City's website uses Google translate which will translate the information posted on the website into 72 languages.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

N/A

7. Summary

As the City enters into its second year of the 2020-2024 Consolidated Plan, it will continue to be aware of the needs in the community and will collaborate with external partners, and residents to ensure CDBG funds have the most impact.

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator		THORNTON	Parks, Recreation, and Community Programs Dept.

Table 1 – Responsible Agencies

Narrative

The Parks, Recreation, & Community Programs department is responsible for preparing Thornton's Annual Action Plan for CDBG, administering the CDBG funds and ensuring compliance with federal regulations. Department staff assigned to CDBG present a draft of the Annual Action Plan to City Council each year and report regularly on the status of activities to address homelessness, affordable housing, community development, and activities to prevent or alleviate house discrimination. Staff from the Finance division, Contracts Administration division and Legal department provide support, as necessary. City Council approves the submittal of plans and substantial amendments to HUD.

Thornton CDBG staff coordinate with Adams County (County) on the assignment of Thornton's portion of HOME funds. These projects are approved by City Council each year; the County administers the funds and is responsible for conducting the public hearing and public comment period.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

In addition to conducting targeted outreach, Thornton has ongoing conversations with agencies throughout the year to identify the current needs of LMI residents. City staff rely on the relationships with partner agencies to get input on community needs and plan the upcoming year's actions. The recent interactions with agencies and departments is summarized below. Also, staff refer to the Consolidated Plan and the needs addressed through previous years Action Plans to help determine what still needs to be addressed

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

Community Connections staff routinely collaborate with housing, health, homelessness service providers, as well as internal city departments, when compiling information for the Annual Action Plan and the Consolidated Plan. The goal of the consultations is to determine the needs in the community that were not being adequately addressed and ways in which coordination between the entities could be enhanced.

Moving forward, Thornton will continue to be an active participant in regional efforts with public and private housing, health, and social service agencies in order to keep abreast of changing demographics, new trends, patterns or programs that impact vulnerable populations, and ideas to overcome challenges low-income people face in Thornton. This includes the regional planning initiatives by the Denver Regional Council of Governments, the Metro Denver Homelessness Initiative (MDHI), and a variety of Adams County taskforces and committees, connecting residents with businesses and nonprofit organizations, and supporting efforts that help low and moderate-income residents become more self-sufficient. Thornton will continue to collaborate with local agencies and businesses to assist in developing a community that supports people of all incomes. Community Connections will also continue collaboration efforts with other city departments that work with partner agencies or provide services to specific populations like the Victims' Advocate Division, Thornton's Police Department's High Density Housing Unit, and Code Enforcement. The Thornton Partnership for Multifamily Communities has been very successful in increasing communication efforts between Police, Community Connections, and housing managers of apartments and manufactured home parks. In addition, Community Connections will continue to coordinate meetings between other city staff and affordable housing developers, nonprofits, and service providers who are looking to expand their presence in Thornton.

In addition to CDBG funding, Thornton provides city general funds (local taxpayer dollars) to local nonprofit organizations to serve low-income and vulnerable populations through Thornton Assistance Funds (TAF). In Fiscal Year 2021, \$150,000 in competitive grants were awarded to 19 local public service

agencies that provide basic needs and support self-sufficiency of Thornton residents. The consultations and collaborations as a result of the TAF process provides the city with valuable insights into the operations of several local service providers as well as further defines the needs, eligibility criteria, and barriers to service for their clients. As the administrator of the Thornton CDBG funds, Community Connections will proactively reach out to organizations and departments that have or are considering projects intended to fill an unmet need to discuss how CDBG or other funding mechanisms might be used to assist with their activities. In addition, staff will explain the processes and requirements associated with different funding options. This will help to increase the capacity of the local agencies to serve the low and moderate-income populations.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Staff keep abreast of local homeless programs, services, and outreach efforts through the Metro Denver Homeless Initiative (MDHI), the Continuum of Care provider for a seven-county area including Adams County. Community Connections views its role as a promoter and supporter of efforts to help people, nonprofit organizations, and private organizations connect into this system. Community Connection staff continue to be active participants in the Adams County Coalition for the Homeless and serves in leadership roles for the county collaborative efforts for the Point in Time count and many other county-wide homelessness initiatives.

In response to COVID-19, Thornton established the Homeless Outreach Team. This CDBG-funded initiative provides lifesaving supplies and resources, as well as limited case-management, to people experiencing homelessness in Thornton. This team leads or contributes to several regional programs and task forces, such as the Severe Weather Activation Plan, HMIS coordination, and the county coalition.

Thornton supports public and nonprofit initiatives to address homelessness. There is political support for these efforts; the Metro Mayor Caucus, of which the City of Thornton Mayor is a member, has defined homelessness as a topic they want to address in their communities. In the past, the city participated in the Homeless to Home Partnership meetings between local residents experiencing homelessness, housing providers, school district liaisons, and municipalities. These meetings lead to the creation of the Adams County Coalition for the Homeless (ACCH). ACCH is a network of community partners collaborating on housing and homelessness issues and solutions so that our community embraces safe, stable, healthy, and accessible housing for everyone so that homelessness is rare, brief, and one-time. In addition, Thornton amended the city code to allow for churches involved with the Adams County Cold Weather Care program to shelter people overnight on an emergency basis. Community Connections has developed homeless resource and housing brochures and a special section of the website is dedicated to listing basic need resources, such as food, health, housing, and transportation. Staff are also available to assist individuals in need by phone, email, or in person.

In addition, Community Connections leads Thornton's internal homelessness taskforce, which brings together several city departments including Police, Code Enforcement, Legal, Parks, and Fire to share data, provide program updates, and strategize best practices for preventing and eliminating homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

This section is not applicable because the City of Thornton does not receive ESG funds

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Maiker Housing Partners (Adams County Housing Authority)
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff speak regularly with staff at the Housing Authority to discuss projects that are underway as well as potential projects that would benefit LMI residents. The City has provided a 1.9 million dollar incentive to develop Crossing Pointe affordable apartments and will provide additional incentives for the second phase of this development scheduled to begin in the summer of 2021. The incentive helped to leverage both HOME and CDBG funds Supporting the construction of new affordable housing is a high priority in the Consolidated Plan.
2	Agency/Group/Organization	Brothers Redevelopment, Inc. (BRI)
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City currently partners with Brothers Redevelopment to conduct the Help for Homes minor home repair program. As such, staff speaks regularly with the agency to discuss the needs of LMI residents.
3	Agency/Group/Organization	Community Resources and Housing Development Corp
	Agency/Group/Organization Type	Housing CHDO Community Development Financial Institution

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Thornton staff regularly talks with CRHDC to discuss ideas to increase affordable housing and relevant trends in the local affordable housing market. In addition, Thornton partners CRHDC to host monthly homebuyer education workshops for residents exploring homeownership option.
4	Agency/Group/Organization	Shiloh Home, Inc
	Agency/Group/Organization Type	Services-Children Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City regularly talks with Shiloh Home to discuss needs specific to at-risk youth. The agency has used CDBG in the past to install an access system and structurally sound doors and frames to ensure the safety and security of the youth at the facility. In response to COVID-19, Shiloh House was awarded CDBG-CV funds for virtual youth programming and enhanced sanitation at their shelter in Thornton.
5	Agency/Group/Organization	Community Reach Center, Inc.
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Community Reach Center (CRC) has assumed the substance abuse services in Adams County after Arapahoe House closed in December 2017. CRC is a past CDBG sub-recipient and was recently awarded CDBG-CV funds for substance abuse services in response to COVID-19.
6	Agency/Group/Organization	Intervention
	Agency/Group/Organization Type	Services - Housing Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Intervention has been using CDBG funds to provide emergency rent, mortgage and utility assistance to victims of domestic violence. Thornton also partners with Intervention to provide domestic violence reduction workshops.
7	Agency/Group/Organization	ALMOST HOME INC.
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Almost Home has been using CDBG funds to provide rent/mortgage and utility assistance to Thornton residents to prevent eviction or homelessness.

8	Agency/Group/Organization	The Senior Hub
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff regularly speak with Senior Hub staff about the needs of the agency and the trends they are seeing in regards to the senior population. Senior Hub provides Meals on Wheels and many transportation programs for seniors in Thornton. In addition, CDBG-CV funds were awarded to Senior Hub to provide safe meal and produce deliver to Thornton seniors living in affordable housing communities.
9	Agency/Group/Organization	City of Thornton
	Agency/Group/Organization Type	Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDBG staff are continually in contact with other City departments, such as City Council, the City Manager's Office, Infrastructure and Parks, Recreation and Community Programs. The goal is to improve coordination between departments, identify resident needs, and potential projects for CDBG funds.
10	Agency/Group/Organization	ADAMS COUNTY
	Agency/Group/Organization Type	Other government - County Grantee Department

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As members of the Adams County HOME Consortium, the City and County have ongoing communication to discuss the status of projects and identify collaborative opportunities. Partnering on projects helps both organizations have a greater impact on achieving shared goals and leveraging funds for more affordable and attainable housing.

Identify any Agency Types not consulted and provide rationale for not consulting

Thornton recognizes the importance of integrating transportation, education, health, housing, and related social services in developing the Annual Action Plan. No organizations were intentionally excluded from the consultation process. In addition, during the development of the Housing Needs Assessment, the consultant reached out to developers, real estate representatives, school districts liaisons, nonprofits, and housing professionals.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Denver Homelessness Initiative	Similar to the City of Thornton's strategic plan, MDHI aims at reducing homelessness in the seven-county Denver metropolitan area. The CoC brings together public and private stakeholder organizations to provide a comprehensive array of homelessness prevention activities, housing placement assistance, and related supportive services for persons who are experiencing homelessness or at risk of becoming homeless.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Comprehensive Plan	City of Thornton	In 2020 Thornton updated its Comprehensive Plan. The plan overlaps with the Consolidated Plan by establishing major strategies and key policies for Thornton's neighborhoods, future jobs, and potential amenities for residents. It also serves as an advisory document for development in the city. This Plan gives a broad overview of how the city will grow, and where future development or redevelopment will occur.

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Thornton makes a concerted effort to ensure the participation of a wide variety of individuals, in particular low- to moderate-income residents, in the development of the Annual Action Plan. The City hopes to receive multiple perspectives in order to get a well-rounded understanding of the community needs. A range of outreach methods are used to get input from residents:

Public Notification. A legal notice was posted in the local paper 19-days prior to the scheduled public hearing date. The notice announced the public hearing to discuss the proposed 2021 Annual Action Plan and included a public comment period that was in compliance with the Thornton's Citizen Participation Plan. The legal notice provided information on how people can participate in the public comment period and public hearing. Also, notices about the public hearing were posted at City Hall, the Carpenter Recreation Center, Community Connections, and the Active Adult Center.

Public Hearing. Thornton held a virtual public hearing on July 27. The public was invited to provide comments on the Action Plan and proposed projects/activities. The public hearing was held virtually due to COVID-19 protocols and Spanish translation was available.

City Website. Information was posted on the City's CDBG webpage requesting feedback on the Annual Action Plan, and providing a summary of the eligible projects for 2021 CDBG funding. The City's website provided contact information for staff as well as a downloadable version of the plan. The City's website uses Google translate which will translate the information posted on the website into 72 languages. Also, the webpage listed the public hearing date and time.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>				
2	Public Hearing	<p>Non-targeted/broad community</p>				
3	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p>				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	19-Day Public Comment Period	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Residents of Public and Assisted Housing</p>				

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Thornton will receive two major sources of funding, CDBG and HOME, from HUD that can help address the goals outlined in the Consolidated Plan. The city participates in the Adams County Consortium for the receipt of HOME funds. Since Adams County is administrator of the HOME funds and is ultimately responsible for reporting to HUD, the estimated HOME allocation is not included in the source of funds chart below.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	850,991	0	0	850,991	0	This grant is designed to provide for the needs of low and moderate income families through the support of housing, economic development, public facility and infrastructure projects and public service programs.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Thornton encourages sub-recipients to leverage other resources to further the impact of the funds. Thornton has partnered with Adams County and the state to appropriately utilize multiple funding sources to support affordable housing projects in Thornton. Thornton expects the leveraging of funding and partnerships to continue as a means to provide a viable community for low-income residents.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

At this time, Thornton has not identified any publicly-owned land to use in order to address the housing needs identified in the Consolidated Plan. For the priority need of non-housing community development, Thornton will look to improve park and recreation facilities at parks and open spaces owned and maintained by the city and located in low- to moderate-income neighborhoods.

Discussion

Thornton will continue to utilize our anticipated resources to meet the needs of our most vulnerable residents. Thornton will receive a small amount of program income through a revolving loan program and will utilize in accordance with all Federal regulations. All public facility improvements will take place in areas where our low to moderate income populations reside. For large projects, Thornton will look toward private and/or local funds to leverage our CDBG funds to maximize the resources available. Since the COVID-19 pandemic has effected Thornton's most vulnerable populations the hardest, CDBG funds, particularly funds allocated to public service activities, will continue to be needed to address many of the issues faced as a result of the public health crisis.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve existing owner-occupied units	2020	2024	Affordable Housing		Affordable Housing	CDBG: \$50,000	Homeowner Housing Rehabilitated: 7 Household Housing Unit
2	Provide improvements to public facilities	2020	2024	Non-Housing Community Development		Non-Housing Community Development	CDBG: \$503,144	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 18000 Households Assisted
3	Provide homeless prevention and supportive service	2020	2024	Homeless		Homeless Services	CDBG: \$127,649	Homelessness Prevention: 60 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve existing owner-occupied units
	Goal Description	This goal will be met by improving existing owner-occupied units through the Help for Homes minor home repair program.

2	Goal Name	Provide improvements to public facilities
	Goal Description	
3	Goal Name	Provide homeless prevention and supportive service
	Goal Description	This goal will be met through a continuation of funding for Thornton's Homeless Outreach Team that provides life-saving supplies, resource navigation, and limited case management to people experiencing homelessness in Thornton.

AP-35 Projects - 91.420, 91.220(d)

Introduction

In 2021, up to 20% of the CDBG allocation will be used to support the administration of the program. The remainder of the grant will fund projects that benefit the low to moderate income community and meet a priority need. Thornton intends to include the following projects in the AAP to meet the needs of the low to moderate community:

Housing Activities:

Thornton will continue to fund the home repair program, Help for Homes, which includes the free minor home repair program for low- to moderate-income homeowners that improve the health, safety, accessibility, and energy-efficiency of the home. The goal of the home repair program is to enable low to moderate income individuals the opportunity to stay in their home while ensuring their basic needs are met.

Public Facilities:

Thornton will utilize 2021 funds to complete the installation of a new sidewalk at 100th Ave and Riverdale Road. In addition, Thornton will use a share of 2021 CDBG funds to provide park and recreation improvements, public artwork, and street improvements in low- to moderate-income neighborhoods in south Thornton.

Public Service Activities:

Approximately \$127,648 will be allocated towards the continuation of activities of the Homeless Outreach Team.

If any of the 2021 projects or proposed activities are not able to start by the required timeframe or have unused or remaining funds after they commence or are completed, Thornton has the option to re-assign funds to any of the other existing, approved 2021 projects, including any reserve projects if applicable. Some of the reasons a project may not be able to start include changes in the original scope of the project, an inability to meet the timing requirements for spending funds, an inability to adequately report outcomes, an inability to meet contract requirements, or the failure to meet or abide by federal regulations.

#	Project Name
1	CDBG Project Administration
2	Housing Improvement Program
3	Public Facility Improvements
4	Public Service Programs

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Thornton continues to see the need to improve owner-occupied homes and continuing the Help for Homes program will allow a greater number of homeowners to participate in this program.

The 2020-2024 Consolidated Plan included the priority need to improve public facilities, particularly in areas of south Thornton that house a disproportionate share of Thornton's low and moderate income residents, as well as Thornton's racial and ethnic minority populations.

DRAFT

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	CDBG Project Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$170,198
	Description	Funds used for the general program administration and delivery.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	CDBG program delivery.
2	Project Name	Housing Improvement Program
	Target Area	
	Goals Supported	Improve existing owner-occupied units
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$500,000
	Description	Funding to continue Thornton's Help for Homes minor home repair program which provides grant funded home repairs that address health, safety, accessibility, and energy-efficiency.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This program has a \$10,000 lifetime limit for clients. With that cap, it is proposed that seven low to moderate homeowners will be assisted through this activity in 2021.
	Location Description	Although this activity is city-wide, Thornton's demographic makeup will target a large share of these funds in southern Thornton, primarily Wards 1 and 2. These areas of Thornton house a disproportionate share of low to moderate income households and Thornton's racial and ethnic minorities.
	Planned Activities	Minor home repair projects that address the health, safety, accessibility, and energy-efficiency of the homes.

3	Project Name	Public Facility Improvements
	Target Area	
	Goals Supported	Provide improvements to public facilities
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$503,143
	Description	Improve public facilities including parks, recreation opportunities, public art work, street improvements, public utilities, and accessibility features such as sidewalks, ramps, etc.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	These activities will be conducted on an area basis with approximately 18,000 households benefiting from these improvements.
	Location Description	Areas that qualify based upon income are overwhelmingly located in south Thornton, generally south of 104th Ave. As such, public facility activities will be limited to these areas which also see the most need for improved access to facilities.
4	Planned Activities	<p>Park and recreation improvements in parks located throughout south Thornton, including Loomis Park, Niver Creek Open Space, and Lambertson Farmstead. Public art work located in south Thornton as well as street improvements.</p> <p>Installation of an ADA accessible sidewalk at 100th Ave. and Riverdale Road.</p>
	Project Name	Public Service Programs
	Target Area	
	Goals Supported	
	Needs Addressed	Homeless Services Non-Homeless Special Needs
	Funding	CDBG: \$127,648
	Description	Public service programs are designed to increase self-sufficiency for low to moderate income Thornton residents. In 2021, Thornton intends to continue the Homeless Outreach Team activity.
	Target Date	9/30/2022

Estimate the number and type of families that will benefit from the proposed activities	It is estimated that nearly 60 households will be served. This activity will also serve people experiencing homelessness.
Location Description	This activity is designed to provide services for a limited clientele, although there is no targeted location. For Thornton's homeless outreach and services activity, a large share of the resources will be targeted to south Thornton, particularly Ward 1, where data has shown most people experiencing homelessness reside.
Planned Activities	Continuation of Thornton's Homeless Outreach Team.

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

While Thornton does not have any specific geographic target areas identified in the Consolidated Plan to direct assistance, Thornton has identified the boundaries of the CDBG-eligible area which encompasses neighborhoods south of 104th. This section of the city is comprised of neighborhoods that have a higher concentration of low-income individuals. Also, there is a higher concentration of Hispanic individuals in the southern section of Thornton than in other areas of the city. Some of the southern tracts consist of more than 50% Hispanic population according American Community Survey data. As such, the areas with the largest percentage of Hispanic individuals coincides with the areas that have the highest proportion of families living at or below poverty.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Thornton has concentration efforts to target resources to areas of south Thornton, which have a disproportionate share of low-income residents as well as where the largest share of the city's racial and ethnic minorities reside.

Discussion

In addition to the information provided by the Census, Thornton has worked on other studies and plans that provide detailed information on the needs of the community as a whole. All studies indicate that the areas in the south show the most need for reinvestment; CDBG funds will likely benefit those same areas. However, the Housing Needs Assessment suggests that there is a need to disperse affordable housing throughout the city so opportunities to support projects that are in the middle and northern sections of the city will be evaluated, as well as affordable housing projects close to the future commuter rail stops that meet Thornton's affordable housing policy goals.

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AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The City's 2019 Housing Needs Assessment (HNA) and Analysis of Impediments to Fair Housing Choice (AI) report indicated that Thornton's policies and practices are consistent with neighboring jurisdictions and do not place undue burdens on housing developers. However, the document did identify several barriers to fair housing, including the lack of affordable housing in the northern part of Thornton and the need for more accessible housing to accommodate the growing senior population. Also, the AI indicated that minority races and ethnicities seem to have a higher rate of housing cost burden, and an insufficient understanding of lending and credit principles for home ownership. There is some resident resistance to the development of affordable housing, often referred to as NIMBYism.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City is taking a proactive approach to reduce barriers to residents attaining affordable housing. In 2021, the City will conduct the following activities aimed at preventing, removing or ameliorating any negative effects public policies may have on affordable housing:

- The City meets monthly with the Home Builders Association to identify barriers and best practices in the development of housing. These meetings are the result of recommendations from a task force on Balanced Housing that was held in 2017. The task force included representatives from the housing industry to discuss ideas to increase the amount of affordable and work force housing in north Thornton. This effort addresses the AI action item to promote affordable housing and successfully integrate it into the community.
- The City is working closely with Maiker Housing Partners, the Adams County Housing Authority, on the development of 142-units of affordable multi-family units on the same site as Crossing Pointe North, an affordable senior housing community of 64-units. This 2nd phase will complete this new, affordable intergenerational community, which is also adjacent to the Thornton Crossing RTD N-Line station providing further mobility opportunities.
- The City routinely holds pre-application/pre-development meetings developers who are considering constructing affordable housing in Thornton, with a focus on promoting these development in the north of the city. City staff will write letters of support for projects when the developers apply for Low Income Housing Tax Credits and other funding. Through on-going talks, the City hopes to hear about any policy barriers from the developers that are creating challenges for the projects in order to problem solve together.

- The City will continue to host free homebuyer education classes with HUD-certified agencies as well as quarterly meetings with property managers of Thornton multifamily properties. These activities will continue to inform future homeowners and property managers about residents' housing rights and the fair housing law. It also educates home buyers on the importance of establishing a good credit history, and a low debt-to-income ratio, which were the main reasons for loan denial rates in Thornton.
- To ensure people with disabilities are able to make accessibility improvements to their housing, the City offers a home repair program, Help for Homes, which provides Thornton homeowners with a grant to make minor health, safety, accessibility, and energy-efficiency improvements to their homes.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

As described in this Plan and Projects section, there are a variety of obstacles to meeting underserved needs in the city. These include a growing need for services as the community expands, a lack of education of available resources within the community, competition for federal and state funds, availability of accessible and affordable housing, the increased cost of housing, gaps in affordability of owner-occupied and rental housing for populations at specific income levels, concentrated areas of affordable housing, and increased compliance and technical skills required for administering the funds.

Actions planned to address obstacles to meeting underserved needs

The city will take the following actions to in order to meet the needs of the underserved population.

- Actively pursue increasing the amount of new affordable housing or work to replace any loss of affordable units in the private market. Historically, the city has allocated CDBG funds to affordable housing projects which were also leveraging state and county funds and assigned Private Activity Bonds for future affordable housing projects. The city has provided letters of support for quality affordable housing projects being considered for Low Income Housing Tax Credits.
- Participate in regional meetings to learn about changes to existing services and new programs available to residents, specifically programs to prevent homelessness.
- Thornton posts information on the city website that people can access 24 hours a day, seven days a week. There is contact information for social service providers and community organizations, such as food banks, health providers, and agencies that assist with substance abuse, transportation, water assistance, or housing.
- Thornton will continue to offer resources for residents who speak Spanish as their primary language.
- Thornton will continue to host free educational workshops and events throughout the year focusing on energy efficiency, first time homebuyer workshops, and senior services. In addition, staff will attend community meetings to provide resources to low-income and special needs populations.

Actions planned to foster and maintain affordable housing

Thornton will support the development and preservation of affordable housing by awarding CDBG funds to continue the home repair program, Help for Homes.

Thornton will also continue to support opportunities for low to moderate income people to become first time homeowners. These strategies include promoting down payment and closing cost assistance

programs offered by the Colorado Housing and Finance Authority and the Metro Mortgage Assistance Plus Program, and hosting monthly HUD-approved homebuyer education courses within the city in partnership with Community Resources and Housing Development Corporation.

Actions planned to reduce lead-based paint hazards

Brothers' Redevelopment Inc., the agency under contract to coordinate the rehabilitation work for Thornton's minor home repair program, complies with the Environmental Protection Agency (EPA) regulations for lead-based paint and has specific actions they follow or require their contractors to follow for testing and abatement if necessary. Depending on the square footage or cost of the potential area of disturbance, different levels of mitigation are done. Homeowners are provided with EPA pamphlets in English or Spanish.

CDBG and housing staff will review the actions taken for these projects and ensure supporting documentation is in place in order to be in compliance with the Lead-Safe Housing Rule Requirements, as identified in 24 Code of Federal Regulations Part 35.

Actions planned to reduce the number of poverty-level families

There were an estimated 10,570 persons living in poverty in 2016, some 375 of which were senior citizens and 1,367 were children under the age of 6. In 2021 and beyond, Thornton will support agencies and initiatives aimed at reducing the number of poverty-level families through ensuring there are opportunities to increase financial knowledge before taking on home loans, aiding supportive services for those in poverty.

The ACS indicated the rate of homeowners at or below the poverty level remained constant (34%) in Thornton. This means that low-income home owners still need assistance with how to increase their net worth and not fall into deep debt. For this reason, Thornton will continue to support down payment assistance and first time homebuyer loan programs. These programs require participants to attend homebuyer education, which is key to the long-term success of the resident maintaining homeownership.

Moving forward, Thornton will continue to explore different ways to reach out to contractors and educate them on what Section 3 means and the benefits of being a Section 3 contractor. For new construction related projects, Thornton will provide sub-recipients and contractors with information on Section 3 and will track all Section 3 businesses funded through CDBG. These will be reported via the Section 3 report that is submitted to HUD. And lastly, the city will promote training and contracting opportunities on Thornton's Section 3 webpage.

Thornton will award grants through the Thornton Assistance Funds program to aid nonprofit organizations in their efforts to help people move from relying on private or public assistance to providing for one's own needs. Thornton believes if basic needs can be met and other supportive

services can be provided, it can help alleviate some of the financial strain on families and help avoid or assist with unanticipated costs such as medical visits. Without assistance, such unanticipated costs often make it difficult for the family to maintain a budget or pay other necessary bills and can result in the loss of time worked. By supporting basic needs and other supportive services Thornton helps enable the individuals and families to continue their upward movement towards self-sufficiency and out of poverty.

Actions planned to develop institutional structure

Incorporated in 1956, Thornton is a "home-rule" city, meaning that it has its own constitution. Thornton has a nine member Council that, with the assistance of the City Manager is responsible for setting policy, making laws, and developing goals for the city. The Council acts, by majority vote, to adopt ordinances and resolutions to guide Thornton in conducting business. The City Manager carries out the policy directions of City Council and supervises and coordinates the work of the staff in the departments that fall under direct control of the City Council. The Parks, Recreation, and Community Programs Department, which is responsible for administering the CDBG program, is one of these departments.

No visible gaps were found in the institutional delivery system. Thornton will continue to facilitate and foster relationships with agencies to strengthen public service, work with other local jurisdictions and organizations to improve the community, and participate in regional efforts that allow for information sharing and dialogue concerning affordable housing and special needs populations including those at-risk of homelessness.

Actions planned to enhance coordination between public and private housing and social service agencies

Thornton will work with public and private housing and social service agencies to enhance coordination in the implementation of the Consolidated Plan. Some of the actions the city will take include:

- Coordinating meetings with the city and county or state if they are also contributing funds to a project in Thornton. Topics may cover how the funding requirements will be addressed so as not to overlap and identify any issues to resolve.
- Communicating with agencies to determine if there are any new needs in the community.
- Offering technical assistance to agencies to discuss the sources of funding available, associated timelines for applying for funds and most impactful uses of funds.
- Participating in regional efforts and meetings with public and private housing and social service agencies and other entitlement communities.
- Surveying manufactured home parks and multifamily apartment complexes to determine the number of units, vacancy and rental rates. The survey also requests data on the number of ADA compliant units in each multifamily housing complex.
- Offering free pre-application meetings for potential developers and/or property owners that are

considering new development or rehabilitation as described under the Development of Institutional Structure section.

- Providing letters of support on behalf of affordable housing project proposals or other project proposals from agencies that are requesting funding from external sources.
- Facilitating opportunities for agencies to collaborate to help the low-income population they serve.

Discussion

As discussed in the 2020-2024 Consolidated Plan, Community Connections uses monitoring efforts to ensure that programs funded with CDBG are compliant with federal, state and local requirements. In order to achieve this goal, the city has developed a comprehensive monitoring plan for all CDBG funded projects.

In 2021, staff will perform desk monitoring, technical assistance and on-site monitoring both pre and post award. The amount of monitoring will vary dependent on the sub-recipient's previous CDBG experience, performance and the complexity of the project. Also, the city ensures compliance during setup, update and closeout of activity information in IDIS. IDIS tracks draw-down of grant funds and provides another level of monitoring to ensure program eligibility. Additionally, regularly updating IDIS helps verify that sub-recipients are on track with expenditures and outcomes. This ongoing review helps the Thornton identify needs of the sub-recipient and provide additional support if necessary.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	12,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	12,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

The city has not used CDBG funds towards a Section 108 loan, urban renewal or float funded activities. Additionally, no grant funds have been returned to the line of credit because of ineligible activities, excessive draws, or ineligible expenditures. Thornton does anticipate receiving approximately \$12,000 in program income prior to the start of the 2021 program year. This program income was received through a now-expired home repair loan program and although the funds received will be under the \$25,000 program income threshold, these program was designed as a revolving loan program and as such any funds receive are included as program income.

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